

*Unrighted 4/23/90*

Best Products Co., Inc., 6601 Owens Drive, Suite 140, Pleasanton, CA 94588-3356 415/463-3301

April 23, 1990

Federal Communications Commission  
1919 M Street NW, Rm. 222  
Washington, DC 20036

ATT: Office of the Secretary - Donna Searcy

REF: In the matter of Part 90 of the Commission's Rules  
to Provide for the Use of the 220-222 MHz Band by  
the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

Best Products wishes to voice its support of the comments of  
Electronic Tacking Systems Inc. with regards to rule-making  
described in the reference above.

We became involved with ETS and the Electronic System in 1989 and  
have found it to be a valuable tool in critical law enforcement  
areas. Specifically, our organization has had experience with  
ETS in the area of armed robberies of our jewelry departments  
where the Electronic Tracking System has resulted in the  
apprehension of the suspects and the recovery of our merchandise  
under circumstances that typically would have resulted in the  
robbers getting away. Over time, we have experienced an overall  
decline in our robbery rate where we employ the system which has  
led to increased personal safety for our employees and customers.

Specifically, we recently experienced robberies in both Santa Ana  
and Huntington Beach, California and in both cases the suspects  
were apprehended. If you need additional information from me,  
please call (804) 261-2112.

Sincerely,

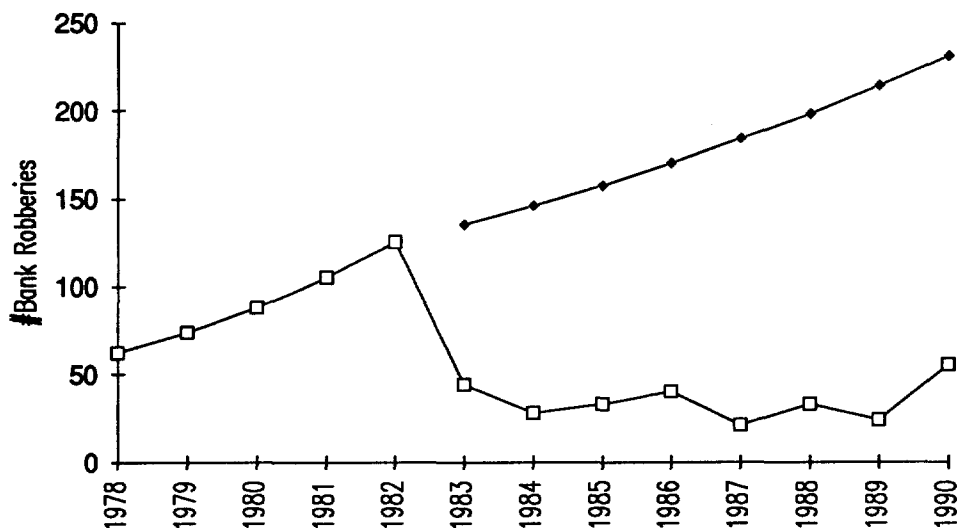
*Shelley Connors*

Shelley Connors  
Director of Loss Prevention

SC/hh

**BEST**

**LAS VEGAS, NV**  
**ETS Introduced 1983**



**LAS VEGAS**

The cities of Las Vegas and North Las Vegas combine to form a circular area of which North Las Vegas is a pie wedge in the northern portion. Late in 1983, the area police departments were certified and the ETS system became operational. The casinos of Las Vegas guard their money carefully and transfer it promptly to the banks. However, given the transient population and the gambling milieu, the number of bank robberies is high.

Equipped with the helicopters and a group of well-trained and disciplined officers with the aid of ETS, the Las Vegas Police reduced burgeoning bank robbery by 65% in their first 9 months of operation.

The technical challenge in Las Vegas was temperature. Hot summer daytime temperatures drive ETS vehicle dashboard displays and trunk mounted receiver to temperatures in excess of 165 degrees Fahrenheit. Lessons were learned about circuit breakers that blow due to temperature, rather than high current flow, and about plastics that should, but, do not, withstand direct sunlight and extreme temperatures. As a result of these climatic problems, Tracking Systems was able to improve its equipment to withstand such climatic problems.



# Las Vegas Metropolitan Police Department

400 EAST STEWART AVENUE  
LAS VEGAS, NEVADA 89101-2984  
PHONE 702/795-3111

**JOHN MORAN, Sheriff**

**ERIC S. COOPER, Undersheriff**

**DAN STOPKA,**  
Assistant Sheriff  
Line Operations

**STEVE WAUGH,**  
Assistant Sheriff  
Staff Operations

**WALTER MYERS,**  
Deputy Chief  
Field Services Div.

**JOHN L. SULLIVAN,**  
Deputy Chief  
Investigative Services Div.

**LARRY C. BOLDEN,**  
Deputy Chief  
Technical Services Div.

**TOM C. CRAWFORD,**  
Deputy Chief  
Administrative Services Div.

**GORDON F. YACH,**  
Director  
Detention Services Div.

**LOIS ROETHEL,**  
Director of Financial Svcs.  
Fiscal Affairs Bureau

April 26, 1990

Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, C.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

REF: In the matter of Part 90 of the Commission's  
Rules to Provide for the Use of the 220-222  
Mhz Band by the Private Land Mobile Radio  
Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice our support of the comments of Electronic Tracking Systems, Inc., with regard to rule making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1984 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking system has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate and this has led to increased personal safety for financial institution customers and employees as well as the citizens of Las Vegas.

Sincerely,

JOHN MORAN, SHERIFF

BY: RICHARD MCKEE, CAPTAIN  
COMMUNICATIONS BUREAU

RM:ht



First In



Nevada



**PRIMERIT**  
BANK

*PriMerit Bank, Federal Savings Bank  
Post Office Box 98379  
Las Vegas, Nevada 89193-8579  
702 362-5555*

*J. Roger Ouellette  
Director of Security*

July 15, 1991

Federal Communication Commission

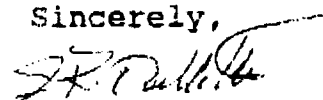
Gentlemen:

PriMerit Savings Bank has had the electronic tracking system for many years now and this system has proven to us that it is by far the best system available to recover our losses in bank robberies. The apprehension rate of these criminals has been about 98 percent so far for our bank, thus minimizing our losses.

We are looking forward to the final installation and expansion of coverage for the Phoenix area to cover our branch's at Scottsdale, Mesa, Sun City, etc.

ProNet has our support for expansion of this system since it has proven to have a great impact on reducing our losses.

Sincerely,

  
Roger Ouellette  
Director of Security

RO/dtc



# Valley Bank of Nevada

MEMBER FDIC

Security Division  
P. O. Box 98600  
Las Vegas, Nevada 89193-8600  
Telephone (702) 654-1227

APR 23 1990

April 19, 1990

Federal Communications Commission  
1919 M Street NW Rm. 222  
Washington, D. C. 20036

Attn: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to  
provide for the use of the 220-222 MHz Band by the  
Private Land Mobile Radio Services

PR DK. NO. 89-552


Dear Sirs:

Valley Bank of Nevada wishes to voice its support of the comments of Electronic Tracking Systems Inc. (ETS) with regards to rule-making described in the reference above.

We became involved with ETS in 1984 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of robberies of our branches, where the ETS has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate where we employ the system, and this has led to increased personal safety for our employees and customers.

A specific case where ETS was particularly useful to us was on 3/12/90. A suspect entered our Nellis Harris Branch and shouted, "This is a hold-up, everyone down!" He jumped over the teller counter, and demanded that the three tellers open their drawers. He removed currency, and ETS units. He again jumped over the counter and fled the building. Approximately 15 minutes later, the suspect and accomplice were apprehended. The suspects were driving a motor home and were in possession of several firearms and a large quantity of ammunition. Nineteen thousand five hundred dollars including the ETS units were also recovered. Metro was able to locate the suspects from the signals being transmitted by the ETS units. It was later learned that the two suspects were wanted by the San Diego PD for numerous robberies in their city. If you need additional information from me, please call (702) 654 1227.

Sincerely,

  
Jimmy Gastineau  
Security Officer

JG/lh

## **ANCHORAGE, ALASKA**

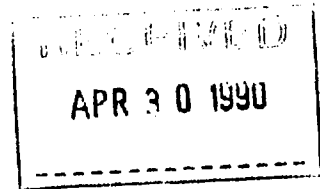
Although reliable deterrent/impact data are not readily available at this time, use of ETS in Anchorage has provided important information about use of the equipment in extremely cold temperatures.

Anchorage experiences significant snowfall in the winter, averaging up to 14 inches a day for fresh falls. Limited antenna heights with delta phase antenna whips deep in snow atop operating police vehicles posed an interesting learning experience especially when coupled with -40 degree Farenheit lows. Equipment was modified to accommodate this environment.

In one armed robbery of a super market, three robbers were trapped in the store after announcing their intent with multiple shots into the ceiling. The prompt arrival of the patrol officers from across the parking lot caused them to run through the store and attempt to escape out the back. The officers beat them to the exit thanks to the accuracy of the ETS on board. Within minutes, three robbers were caught.

# CARRS

## QUALITY CENTERS



1341 Fairbanks Street

Anchorage, Alaska 99501

(907) 277-6639

April 25, 1990

Federal Communications Commission  
1919 M Street NW Rm. 222  
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's  
Rules to Provide for the Use of the 220-222 MHz  
Band by the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice our support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1986 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was during a robbery which occurred at one of our stores in October, 1987. Three suspects were involved. One was killed in a police shootout, one was captured at the store and one escaped but was subsequently captured when his location was pinpointed by the Electronic Tracking System.

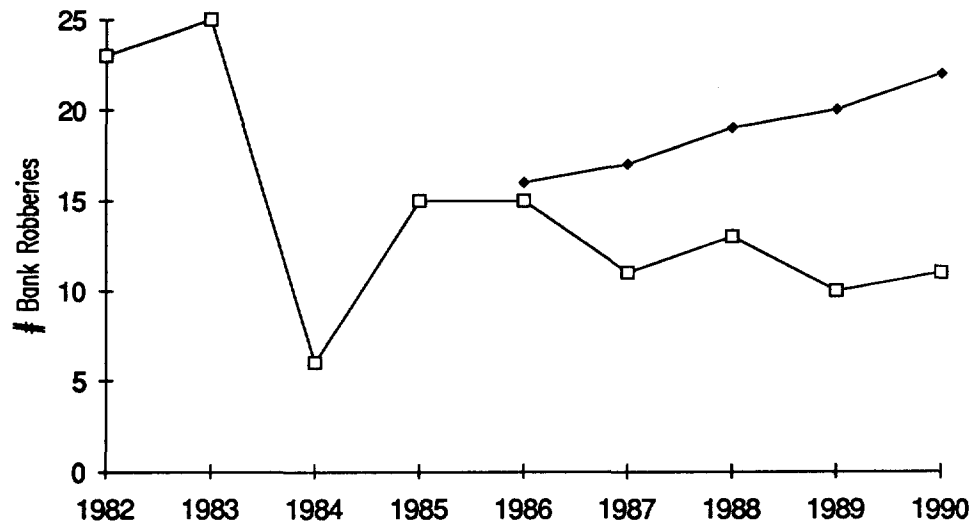
If you need additional information from me, please call at 907-564-2544.

Sincerely,

M. Peter Johnson, Jr.  
Director of Loss Prevention

cc: Harry A. Currie, Vice President, Operations & Technology  
Electronic Tracking Systems Inc.  
P. O. Box 260409, Plano, Texas 75026-0409

**AUSTIN, TX**  
**ETS Introduced 1984**



**AUSTIN**

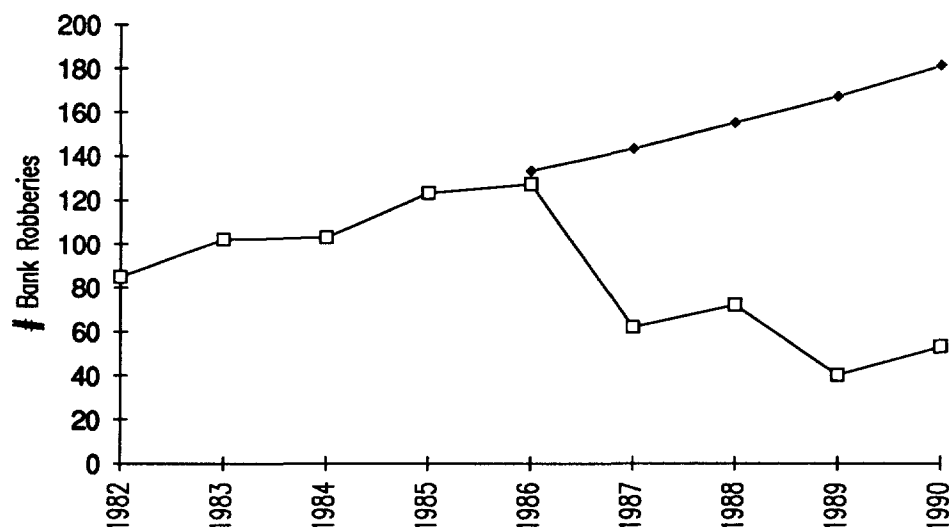
Austin, Texas was selected as a test bed for ETS because it represented a typical, medium-sized American city with three specifically distinct attributes: the seat of a state capital, the seat of a major state college, with proximity to Mexico, and a sizable Hispanic population. None of these factors proved to be important, however.

The most critical factor favoring almost immediate success of system operations accompanied by ease of installation and training was the lack of bureaucracy in Austin. Our experience is similar throughout the markets tested and surveyed. Big government is just hard to work with effectively. Nevertheless, ETS has been effective in larger cities, but it has been harder to start-up and implement.

The above curve speaks fluently of the statistics of ETS' impact in Austin.

In fact, recently, a new small bank opened in downtown Austin. It was robbed on opening day of more than \$120,000. The new bank would have closed that same day but for complete recovery of the stolen funds by the police, using the ETS system in less than eight minutes.

**SACRAMENTO, CA**  
**ETS Introduced 1985**



**Sacramento**

Sacramento, California, operations include the city of Sacramento and its Police Department, and it includes the County of Sacramento and its Sheriff's Department. Coincidentally, the city of Folsom, and the famous Folsom Prison lie entirely in the county and house many of the bank robbers caught by the police using ETS throughout California.

Several specific areas of ETS were tested in this community.

1. The coordination between "competing" departments (i.e. City Police Department and County Sheriff's Department).

The competitive aspect proved effective. It helped overcome the stagnancy of the bureaucracy and made both departments coordinate their efforts towards a common goal.

2. An attempt to cover a large, county-wide area.

Significant population in the Sacramento area is resident in unincorporated county areas. These areas are suburban in nature. With the aid of good roads and freeways and a dedicated helicopter force, operations throughout the county were as successful as in any city.

**Sacramento Continued:**

3. The wide scale use of ETS devices for stake-out purposes under the direction and control of the police.

ETS supplied 75 stake-out devices for use in a trial project that has proven so successful that it continues to this day, 5 years later. Smaller businesses are "loaned" stake-out devices under the direction and control of the police for a limited time during periods when these types of businesses are under duress from robbers. Over 50 people have been incarcerated as a result of this project in Sacramento.

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**SACRAMENTO COUNTY****SHERIFF'S DEPARTMENT**

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**Glen Craig  
Sheriff**

April 19, 1990

Federal Communications Commission  
1919 M Street NW Room 222  
Washington, D.C. 20036

APR 23 1990

ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules  
to Provide for the Use of the 220-222 MHz Band by  
the Private Land Mobile Radio Services.

PR DK. 89-552

Dear Sirs:

The Sacramento Sheriff's Department wishes to voice its support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1984 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of robberies of Sacramento financial institutions, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate where we employ the system, and this has led to increased personal safety for the citizens who live and/or work in Sacramento. To date, more than 100 felony arrests have been made as a direct result of this system.

In addition we are using this system for investigative applications, primarily in our Narcotic Bureau. We have used ETS transmitters to stay on top of large amounts of "flash" money, to assist in staying with our undercover officers and in following suspect vehicles. We are gradually expanding the use of the system into other areas of investigation.

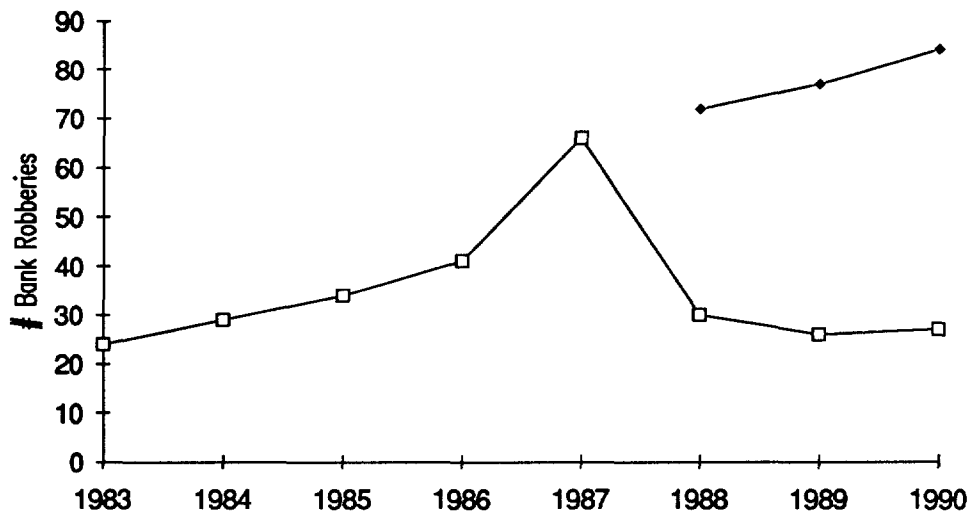
If you need additional information, please call me at  
(916) 440-5277.

Sincerely,

Captain Phil Davis  
Technical Services Division

PD:jm

**DALLAS, TX**  
**ETS Introduced 1987**



**DALLAS**

Dallas, Texas was the first true multi-city/metropolitan use of ETS. Seven adjacent cities in the Dallas/Ft. Worth metroplex cooperate in the use of ETS.

Specific features of the system include the interaction of three Area Wide Monitors and seven police jurisdictions to form the ETS "network." This network involved the training of hundreds of police patrol officers and their responsive chain of commands from seven differing points of view.

Many interwoven intra- and inter-departmental policies and procedures have been involved. In some cases, complete inter-departmental procedures had to be generated for the first time, including both the cooperative areas of hot pursuit and search and seizure. Nevertheless, robbers began to be quickly caught and the ETS system acceptance and performance was both effective and appreciated throughout both the police and banking communities.

During the period of installation in the Dallas area, a bank robber, dubbed "The Dapper Bandit," (he dressed nicely and acted courteously) was terrorizing banks from Dallas to San Antonio. He had robbed 22 banks in the course of 10 years for a half million dollars. The police had good video and 35 mm evidence on him, but no leads. Shortly, after ETS was set-up in Dallas, he hit a small bank in the northern portion of that city. He vaulted the counter, inspected and took money from three teller drawers. Ten minutes later he was in custody; another "victim" of ETS.

**Dallas Continued:**

In addition, this felon was involved in making bomb threats. The police, using ETS, actually were working a stake-out on a bomb threat he was conducting at the time of his capture. On searching his apartment and second vehicle, real bombs were found ready to be detonated.



CITY OF DALLAS

July 18, 1991

Federal Communications Commission  
1919 M. Street NW, Room #222  
Washington, D.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

REFERENCE: IN THE MATTER OF PRO NET INC. PETITION FOR RULE MAKING FOR  
THE PERMANENT PROVISION OF ELECTRONIC TRACKING SERVICES

Dear Sir:

The Dallas Police Department wishes to voice its support of the petition submitted by Pro Net Inc. for the permanent provision of an Electronic Tracking Services (ETS) within the rules and provisions of the FCC. The Dallas Police Department as well as the Metroplex surrounding Dallas needs the technology that the Tracking system provides. This vital law enforcement monitoring and tracking service enables us to promote safety of life and property through the expanded use of radio communications for crime control and prevention.

We became involved with ETS and the Electronic Tracking System in August 1987 and found it to be a valuable tool in law enforcement. Specifically, our organization has had experience with ETS in the area of financial institution robberies, where the Electronic Tracking System has resulted in the apprehension and subsequent conviction of the felony robbery suspect, under circumstances that typically would result in the robber getting away.

The Electronic Tracking System also allows the user police departments the advantage of making the arrest away from the location of the offense. This has led to increased personal safety for financial institution customers and employees, police officers, and the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was the arrest of Mark Reeves aka: "The Dapper Bandit" who had been robbing banks in Texas for nine (9) years. In addition, in the last eighteen (18) months we have recovered over \$120,000.00 taken from financial institutions that would not have been recovered without ETS.

Page Two (2)  
Federal Communications Commission  
1919 M. Street NW, Room #222  
Washington, D.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

REFERENCE: IN THE MATTER OF PRO NET INC. PETITION FOR RULE MAKING FOR  
THE PERMANENT PROVISION OF ELECTRONIC TRACKING SERVICES

If you need additional information from me, do not hesitate to call. The liaison officer for the Dallas Police Department for this project is Sergeant James W. Andrews, phone 214-670-5146.

Sincerely,

WILLIAM M. RATHBURN  
CHIEF OF POLICE



Ray Hawkins  
Deputy Chief of Police  
Crimes Against Persons Bureau

ma

0003M



CITY OF DALLAS

April 20, 1990

Federal Communications Commission  
1919 M Street NW Room #222  
Washington, D.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

Reference: In the matter of Part 90 of the Commission's Rules to Provide  
for the Use of the 220222 MHz Band by the Private Land Mobile  
Radio Services

PR DK. NO. 89552

Dear Sirs:


The Dallas Police Departments wishes to voice its support of the comments  
of Electronic Tracking Systems Inc. with regards to rule-making described  
in the reference above.

We became involved with ETS and the Electronic Tracking System in August  
1987 and have found it to be a valuable tool in critical law enforcement  
areas. Specifically, our organization has had experience with ETS in the  
area of financial institution robbery, where the Electronic Tracking System  
has resulted in robbery felon apprehension and subsequent conviction under  
circumstances that typically would have resulted in the robber getting away.  
This has led to increased personal safety for financial institution customers  
and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful  
to us was the arrest of Mark Reeves aka the Dapper Bandit who had been robbing  
banks in Texas for nine (9) years. If you need additional information from  
me, please call at 214-670-5146.

Sincerely,

MACK VINES  
CHIEF OF POLICE

  
Ray Hawkins  
Deputy Chief of Police  
Crimes Against Persons Division  
Criminal Investigation Bureau

JWA:ma



APR 23 1990

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No.

1801 N. Lamar St., Suite 300  
Dallas, Texas 75202  
April 19, 1990

Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, D.C. 20036

Attention: Donna Searcy  
Office of the Secretary

RE: In The Matter of Part 90 of The Commission's Rules  
to Provide for the Use of the 220-222 MHz Band by the  
Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

The Federal Bureau of Investigation (FBI), Dallas, Texas, has been contacted by Electronic Tracking Systems Inc. (ETSI), based in Dallas, Texas requesting FBI support for ETSI's application for additional frequency spectrum.

This communication is in support of not ETSI or any other individual company, per se, but instead for whatever improvements or expansions might be made in electronic currency tracking systems, currently marketed by ETSI under the name ProNet Tracking Systems.

The FBI is aware this electronic tracking system has been installed in several cities in the United States, and is further aware the system has very significantly increased the number of apprehensions in robbery situations wherein electronically equipped currency packets were taken in robberies. The Dallas FBI, for purposes of illustration, in concert with the Dallas Police Department, Texas Rangers, and numerous other law enforcement agencies, vigorously sought the apprehension of an extremely

proficient armed robber who victimized Texas banks over a ten year period commencing in 1978. The above named law enforcement agencies, after other conventional investigative approaches had produced no positive results, conceived the idea of introducing the currency tracking system to the banks located in the particular area of Dallas normally targeted by the bandit. The installation was accomplished and the bandit was arrested within months of the installation as a direct result of the system's installation. He had, prior to his capture, successfully obtained in excess of \$750,000 from Texas banking institutions by means of 27 bank robberies and bank extortions.

The FBI supports ETSI's application for frequency band expansion insofar as such expansion would facilitate expanded use of the currency tracking system in robbery and/or extortion applications.

Sincerely,

Bobby R. Gillham,  
Special Agent in Charge

cc: Electronic Tracking Systems Inc.  
600 Data Drive, Suite 100  
Plano, Texas 75075

MAYOR  
Sam P. Burford, Jr.

MAYOR PRO TEM  
Robert O. Mullins

COUNCIL MEMBERS  
Wade C. Smith  
Waldo S. Powell  
Gordon G. Tucker  
Jos. Irion Worsham

TOWN ATTORNEY  
H. Lou Morrison, Jr.

TOWN JUDGE  
Pat A. Robertson

THE TOWN OF

*Highland Park*  
TEXAS

4700 DREXEL DRIVE, HIGHLAND PARK, TEXAS 75205  
Telephone (214) 521-4161

TOWN ADMINISTRATOR  
L.A. (George) Patterson

TOWN ENGINEER  
Jim Dower

TOWN SECRETARY  
James Fisher

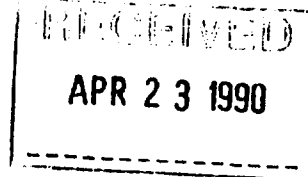
DIRECTOR OF  
PUBLIC SAFETY  
Darrell Fant

DIRECTOR OF FINANCE  
Bill Pollock

DIRECTOR PARKS/SANITATION  
Ronnie Brown

April 4, 1990

Federal Communications Commission  
1919 M Street NW Rm. 222  
Washington, D.C. 20036



ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commissions Rules  
to provide for the use of the 220-222 MHz Band by  
the Private Land Mobile Radio Services.

FR DK. NO. 89-552

Dear Sirs:

The Highland Park D.P.S. wishes to voice its support of the comments  
of Electronic Tracking Systems Inc. with regards to rule-making  
described in the reference above.

The Highland Park Department of Public Safety became involved with  
Electronic Tracking Systems Inc. in 1987. We believe that this  
relationship has been extremely valuable in terms of Law Enforcement  
applications. Since the initial inception of the system the Highland  
Park Department of Public Safety has used the system three times in  
the apprehension of robbery suspects and 29 times in the capture and  
conviction of burglary suspects. In every case the suspect has been  
captured away from the location of the offense and in possession of  
the stolen property. This combination of events has led to a safe  
environment for the capture, a 99% conviction rate in court and a  
recovery of \$60,000.00 worth of stolen property.

The Highland Park Department of Public Safety is extremely interested  
in the further development of the ETS system and a possible expansion  
of its Law Enforcement applications.

Attached is a history of the Highland Park Department of Public  
Safety's use of the ETS system. If you need additional information  
from me, please call at 214-521-4161.

Sincerely,

A handwritten signature in cursive script that reads "Bobby Richardson".

Captain Bobby Richardson  
Communications Systems Supervisor

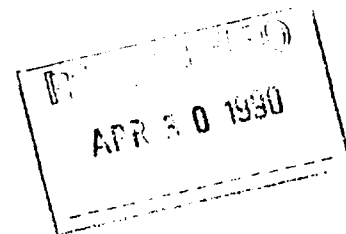
ELECTRONIC TRACKING SYSTEMS (ETS)  
HIGHLAND PARK DEPT. OF PUBLIC SAFETY - SUMMARY

| NO. | DATE                 | LOCATION                                      | Suspect<br>Description    | Age            | Property<br>Recovery | Arrest<br>Location | Case<br>Disposition                                |
|-----|----------------------|---|---------------------------|----------------|----------------------|--------------------|--|
| 01  | 11-07-88<br>4:30 AM  | 3400 blk. Gillon                              | No suspect<br>information | N/A            | none                 | No arrest made     | N / A  |
| 02  | 02-18-89<br>1:00 AM  | 4600 Abbott Ave                               | 1 W / M                   | 24             | Passport             | 3600 Beverly Drive | Pled for 12 years TDC                              |
| 03  | 04-14-89<br>8:20 PM  | 4600 Bowser Ave                               | 1 B / M                   | 38             | VCR                  | 4600 Lemmon Ave    | Pled for 5 years<br>Probation                      |
| 04  | 04-29-89<br>3:15 AM  | 4800 Abbott Ave                               | 1 W / M                   | 25             | Escort               | 5400 Cedar Springs | Pled for 5 years<br>Probation                      |
| 05  | 05-31-89<br>6:15 PM  | 4800 Westside Dr.                             | 1 B / M                   | N/A            | Passport             | No arrest made     | Property recovered<br>abandoned in Apt.<br>Complex |
| 06  | 06-03-89<br>1:12 AM  | 5100 Westside Dr.                             | 1 W / M                   | 22             | Passport             | 5500 Glenwick      | Indictment made<br>no case disposition             |
| 07  | 06-20-89<br>11:23 PM | 4600 Bowser Ave.                              | Unknown                   | N/A            | Escort               | No arrest made     | Property recovered<br>abandoned in roadway         |
| 08  | 07-19-89<br>9:42 PM  | 5800 Golf Drive                               | 1 W / M                   | N/A            | Escort               | No arrest made     | Property recovered<br>3901 Bryn Mawr               |
| 09  | 07-23-89<br>9:31 PM  | 5800 High School                              | 1 W / M                   | 31             | Passport<br>VCR      | 1800 N. Central    | Indictment made<br>no case disposition             |
| 10  | 07-29-89<br>4:41 PM  | 5500 Golf Drive                               | 1 W / M                   | 18             | Escort               | 3400 Asbury        | Indictment made<br>no case disposition             |
| 11  | 08-09-89<br>5:48 AM  | 5000 Sewanee Ave.                             | 2 L / M                   | 18<br>16       | Passport             | 5300 Ellsworth     | Indictment made<br>no case disposition             |
| 12  | 08-16-89<br>1:52 AM  | 4200 Westway                                  | 2 W / M                   | 18<br>16       | Passport<br>VCR      | 4500 Rheims Place  | pled 10 years<br>referred to juvenile<br>court     |
| 13  | 08-21-89<br>10:30 PM | 4400 Westway Ave.                             | 3 W / M                   | 37<br>22<br>16 | Escort               | 7816 Purdue        | Indictment made<br>no case disposition             |
| 14  | 08-23-89<br>2:53 AM  | 4600 Westside Dr.                             | 2 W / M                   | 23<br>21       | Escort               | 4679 Westside Dr.  | Indictment made<br>no case disposition             |
| 15  | 09-06-89<br>10:17 PM | 5700 Lomo Alto<br>University Park             | 1 W / M                   | 27             | Escort<br>UPPD       | 300 Exposition     | Indictment made<br>no case disposition             |
| 16  | 09-10-89<br>1:57 PM  | 4100 Lomo Alto                                | 1 B / M                   | 43             | Escort               | 4605 Bowser        | Indictment made<br>no case disposition             |
| 17  | 09-23-89<br>3:50 PM  | Beltline and<br>Plano Road<br>Tom Thumb Store | 1 B / M                   | 34             | \$3000.00            | 1300 N. Stemmons   | Indictment made<br>no case disposition             |
| 18  | 09-27-89<br>8:58 PM  | 3500 Lexington                                | 2 B / M                   | 26<br>26       | Passport             | 5000 Preston Road  | Indictment made<br>5 Year Adjudicated<br>Probation |
| 19  | 10-01-89<br>7:47 PM  | 3500 Lexington                                | 2 W / M                   | 16<br>16       | Escort               | 3600 Lexington     | Referred to juvenile<br>court                      |
| 20  | 10-18-89<br>2:49 AM  | 4600 Abbott Ave.                              | 1 W / M                   | 24             | Escort               | 3800 Beverly Dr.   | Indictment made<br>no case disposition             |

ELECTRONIC TRACKING SYSTEMS (ETS)  
HIGHLAND PARK DEPT. OF PUBLIC SAFETY - SUMMARY

| NO. | DATE                | LOCATION          | Suspect<br>Description | Age      | Property<br>Recovery | Arrest<br>Location | Case<br>Disposition                               |
|-----|---------------------|-------------------|------------------------|----------|----------------------|--------------------|---|
| 21  | 10-22-89<br>2:49 AM | 5400 Sewanee Ave  |                        |          | Escort               |                    | Property Recovery only<br>SMU Campus              |
| 22  | 11-11-89<br>9:45 PM | 4600 Bowser Ave.  | 2 B / M                | 20<br>22 | Passport             | 333 Jefferson Blvd | Indictment made<br>no case disposition            |
| 23  | 11-16-89            | 4600 Arcady       | 1 L / M<br>1 W / M     | 33<br>34 | Escort               | 3900 Lemmon Ave    | Indictment made<br>no case disposition            |
| 24  | 11-19-89            | 5100 Westside Dr. | 1 L / M                | 22       | Escort               | 5122 Bowser Ave    | Indictment made<br>no case disposition            |
| 25  | 11-19-89            | 5000 Abbott Ave   |                        |          | Escort               |                    | Property Recovery only<br>S. Alley 3300 Princeton |
| 26  | 11-29-89            | 4500 Westside Dr  | 1 B / M                | 35       | Escort               | Wheeler at Bowser  | Indictment made<br>no case disposition            |
| 27  | 01-28-90            | 4300 Livingston   | 1 W / M                | 16       | Escort               | 4500 Edmondson     | Referred to Juvenile<br>court                     |
| 28  | 02-27-90            | 4600 Westside Dr. | 1 B / M                | 25       | Escort               | 4503 Lake St.      | Indictment made<br>no case disposition            |
| 29  | 04-11-90            | 4800 Lemmon Ave.  | 1 L / M                | 20       | Escort               | 4600 Lemmon Ave.   | Indictment Pending                                |
| 30  | 04-12-90            | 4820 Lemmon Ave   | 2 B / M                | 24<br>25 | Escort               | 4600 Lemmon Ave.   | Indictment Pending                                |

**Sunbelt Savings** FSB



April 25, 1990

Federal Communications Commission  
1919 M. Street NW, Room 222  
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

Reference: In the matter of part 90 of the Commission's Rules to  
provide for the use of the 220-222 MHz band by the  
Private Land Mobile Radio Services:

PR DK No. 89-552

Dear Sir or Madam:

On behalf of Sunbelt Savings, FSB I wish to voice our support of  
the comments of Electronic Tracking Systems Inc., (ETS) with  
regard to rule-making described in the above reference.

Sunbelt Savings, FSB has been involved with ETS and the Electronic  
Tracking System for over one (1) year and has found it to be a  
valuable asset in critical law enforcement areas. Specifically,  
our organization has had experience with ETS in the area of  
financial institution robbery. Although we have never experienced  
an actual robbery in which the suspect's apprehension and  
subsequent conviction were directly attributable to the ETS  
system, I am personally aware of other institutions who have  
experienced such incidents. Additionally, I would like to go on  
record as a supporter of the ETS System to the degree that all of  
Sunbelt's branches which are located in an area served by the ETS  
System have had the system installed. Furthermore, I believe that  
if the ETS service area can be broadened to encompass additional  
branches and banks, a significant overall decline in the rate of  
robberies at financial institutions could follow. If and when a  
decline in robberies of financial institutions occurs it will  
obviously provide increased personal safety for financial  
institution customers and employees, as well as all the citizens  
of our community.

Thank you for your courtesy in allowing me to provide you with  
this letter of support for Electronic Tracking Systems, Inc.

Page 2  
D. Searcy  
4-15-90

Additionally, if there is any further information concerning this matter that I may provide to you; please do not hesitate to contact me at (214) 717-8700.

Sincerely,



Monte C. Dunn  
AVP/Director  
Corporate Security  
Sunbelt Savings, FSB

MCD/td

cc: Harry Currie



April 23, 1990

Federal Communications Commission  
1919 M Street, N. W.  
Room 222  
Washington, D. C. 20036

ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules  
to Provide for the use of the 220-222 MHz Band by  
the Private Land Mobile Radio Services

PR DK. No. 89-552

Dear Ms. Searcy,

The North Texas Regional Clearing House Association (NTRCHA), a trade association of sixty-seven financial institutions in the Dallas/Fort Worth metroplex, wishes to voice support of comments from Electronic Tracking Systems, Inc. with regard to rule-making described in the reference above.

NTRCHA members have used the Electronic Tracking System for more than three years and find it to be an important and successful tool in reducing bank robberies and in assisting law enforcement agencies in the speedy recovery of stolen property. Our members are realizing an average mean time from robbery to capture of twelve minutes. No other methods or options have been as effective or successful.

Because of the ETS System, our members are not only satisfied with the recovery of stolen money but, more importantly, they are pleased with the apprehension, conviction and incarceration of the felons. NTRCHA members have realized a distinct decline in the robbery rate wherever the system is employed. Additionally, the personal safety risk of both employees and customers is reduced.

Federal Communications Commission  
Page #2

Due to the system's success, the NTRCHA has been instrumental in the expansion of coverage to the Austin and Houston areas, and expect the San Antonio banks to initiate the Electronic Tracking System later this year. Currently, almost 2,000 devices are installed in the three Texas cities.

Two specific cases where the system has been instrumental in apprehensions are: 1) in Dallas, the capture of the "Dapper Bandit" who now resides in a federal prison, and 2) in Austin where, after a robbery, the robber was tracked approximately 100 miles by helicopter and captured in Waco, Texas.

We strongly urge you to decide in favor of the Electronic Tracking System, Inc. request. Should you have questions or need additional information regarding our use and application of the system, please contact me at 214/954-0585. Thank you for your consideration of this request.

Sincerely,



Thomas J. Patrick  
Executive Director

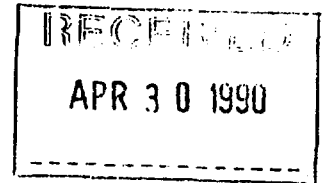
TJP/m

✓ cc: C. Michael Iles - ETS



14303 Inwood Road  
Dallas, Texas 75234  
(214) 661-9700

BEN ADAMCIK  
DIRECTOR OF SECURITY  
AND LOSS PREVENTION



April 23, 1990

Federal Communications Commission  
1919 M Street N.W., Room 222  
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules  
to Provide for the Use of the 220-222 MHz Band by  
the Private Land Mobile Radio Services  
PR DK. NO. 89-552

Dear Sirs:

As Security Director for my company, I wish to voice my support  
for Electronic Tracking Systems, Inc., with regard to the rule  
making described above.

Tom Thumb Inc., became involved with Electronic Tracking Systems  
(E.T.S.) in 1986 and have found it to be an invaluable tool in  
the law enforcement area. We operate over eighty stores in Texas  
and use E.T.S. in the majority. This has resulted in a  
tremendous decrease in robberies of our stores and a near perfect  
clearance rate of those robberies that did occur. This has led  
to a sharp decline in overall robberies as the word gets out to  
stay away from Tom Thumb.

The personal safety of our associates is our number one concern,  
and with E.T.S. we are able to provide the extra measure of  
security that allows our associates to be fully cooperative with  
any robber and not attempt any action that could keep a robbery  
suspect in our store any longer than necessary.

We have had numerous success stories with E.T.S. and, if desired,  
I would share those, but the most rewarding is the ability to  
provide this added security to our associates and customers of  
not involving themselves in attempting to stop a robbery.

Sincerely,

*Ben Adamcik*  
Ben Adamcik  
Director of Security  
and Loss Prevention

BA:jl

Cullum Companies, Inc.



# CITY OF HUNTINGTON BEACH

2000 MAIN STREET  
P. O. BOX 70

POLICE DEPARTMENT

CALIFORNIA 92648  
Tel: (714) 960-8811

RONALD E. LOWENBERG  
Chief of Police

April 24, 1990

Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, D.C. 20036

ATTENTION: Office of the Secretary, Donna Searcy

Reference: In the Matter of Part 90 of the Commission's Rules to  
Provide for the Use of the 220-222 MHz Band by the Private  
Land Mobile Radio Services PR DK. NO. 89-552

Dear Sirs:

We wish to voice support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1989 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. We anticipate an overall decline in our robbery rate, and thus an increase in personnel safety for financial institution customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was last week when it assisted us in the location of a robbery suspect who was fleeing on an interstate highway through our jurisdiction. We picked up the ETS signal, identified the vehicle in heavy traffic, and subsequently arrested him and recovered thousands of dollars in stolen property. It could not have been accomplished without the use of the ETS equipment. If you need additional information from me, please call (714) 960-8807.

Sincerely,

  
Ronald E. Lowenberg  
Chief of Police

REL:aa



## CITY OF COSTA MESA

CALIFORNIA 92628-1200

P.O. BOX 1200

---

FROM THE POLICE DEPARTMENT

April 23, 1990

Federal Communications Commission  
1919 M. Street NW rm. 222  
Washington, DC 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of part 90 of the Commissions' rules to provide for the use of the 220-222 MHZ Band by the private land mobile radio services.

PR DK NO. 89-552

Dear Commissioners;

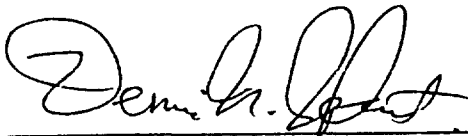
The Costa Mesa Police Department supports the comments of Electronic Tracking Systems Inc. with regards to rule making described in the reference above.

Our Department has been using ETS from December 1, 1990 to the present and have found it to be an extremely valuable tool in the apprehension of felony suspects. We plan on expanding the use of ETS in the coming years as it has proven to be highly effective under field conditions.

To date. ETS has been responsible for four arrest and over \$200,000.00 dollars in property recovery in this City and over 37 arrest and \$1,250,000.00 dollars recovered County wide over the last five months. Before we had this equipment, the whole County would have been lucky to have four arrest and \$10,000.00 in recovery of stolen property during the same period of time involving the same types of crime.

The Department encourages the FCC to grant the Frequency request of ETS as their technology is invaluable to law enforcement. If you need additional information, call me at (714) 722-6714 between 10AM and 5PM PDT.

Sincerely;

A handwritten signature in black ink, appearing to read "Dennis N. Jefcoat", written over a horizontal line.

Dennis N. Jefcoat  
Senior Police Officer  
ETS Co-ordinator  
Costa Mesa Police Department.

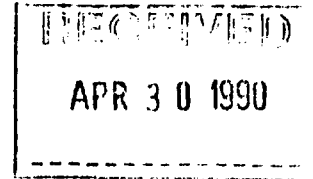


## POLICE DEPARTMENT

237 WEST COMMONWEALTH AVENUE • FULLERTON, CALIFORNIA 92632 • PH. (714) 738-6800

PHILIP A. GOEHRING CHIEF OF POLICE

April 23, 1990



REFERENCE TO

Federal Communications Commission  
1919 M Street NW Rm. 222  
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice its support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in the City of Fullerton and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was the recent armed robbery of a Fullerton bank where the suspects were taken into custody only minutes after the robbery, after the ETS device was activated. If you need additional information from me, please call at (714) 738-6840.

Very truly yours,

PHILIP A. GOEHRING  
Chief of Police

CAPTAIN L.R. DeVORE  
Commander, Investigation Division

LRD:kyt

bc: Electronic Tracking Systems Inc. ✓



APR 30 1990

**CITY OF SIGNAL HILL**

1800 E. Hill Street • Signal Hill, California 90806 • (213) 426-7333 • FAX (213) 427-3276

April 23, 1990

Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, D.C. 20036

Attention: Office of the Secretary  
Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules  
to Provide for the Use of the 220-222 MHz Band by  
the Private Land Mobile Radio Services

FR DK. NO. 89-552

Dear Sirs:

We wish to voice our support of the Electronic Tracking Systems, Inc. regarding rules-making as described in the reference above.

We became involved with ETS and the Electronic Tracking System in November of 1989 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization anticipates that future experience with ETS in the area of financial institution robberies, will result in robbery felon apprehensions and subsequent convictions under circumstances that typically would have resulted in the robber getting away. Over time, we are certain that our agency will experience an overall decline in our robbery rate, and will lead to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

Sincerely,

  
Michael R. McCrary  
Chief of Police  
SIGNAL HILL POLICE DEPARTMENT



CITY OF ANAHEIM, CALIFORNIA

Police Department

April 18, 1990

APR 23 1990

Federal Communications Commission  
1919 M. Street NW Rm. 222  
Washington, D.C. 20036

ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the  
Use of the 220-222 MHz Band by the Private Land Mobile Radio  
Services.

PR DK. NO. 89-552

Gentlemen:

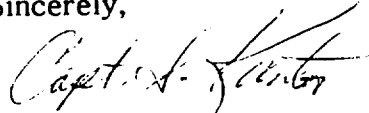
The Anaheim Police Department wishes to voice its support for Electronic Tracking Systems, Inc. (E.T.S.) with regards to rulemaking described in the reference above.

We became involved with E.T.S. and the Electronic Tracking System in 1989, and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with E.T.S. in the area of robberies of Anaheim financial institutions, where the Electronic Tracking System has resulted in the apprehension and subsequent conviction of felony robbery suspects under circumstances that would have typically resulted in the escape of the suspect. Historically; police agencies using E.T.S. equipment have experienced an overall decline in the robbery rate, leading to increased personal safety for the citizens who live and/or work in the community.

A specific case where the Electronic Tracking System was particularly useful to us occurred on December 6, 1989, when two armed suspects robbed a local Bank of America branch. The suspects were able to obtain the money from the bank and flee prior to the arrival of police officers. The suspects drove to a garage in an apartment complex a short distance away and concealed both themselves and their vehicle. Fortunately, the bank was equipped with E.T.S. equipment, and officers were able to quickly locate and apprehend the suspects. Due, primarily to the E.T.S. equipment, we were able to recover the stolen money, weapons and other evidence.

If you need additional information or if we can be of further assistance to you in this matter, please do not hesitate to call me at (714) 999-1923, or Lieutenant Marc Hedgpeth, Commander of the Crimes Person Bureau, at (714) 999-1927.

Sincerely,

A handwritten signature in cursive script, appearing to read "Capt. S. Kantor".

CAPTAIN STANLEY S. KANTOR  
ACTING CHIEF OF POLICE

cc: C. Michael Iles, ProNet Tracking Systems

D3507S/jn



CITY of

*La Habra*



**POLICE DEPARTMENT**  
150 N. EUCLID STREET  
LA HABRA, CALIFORNIA 90631  
(213) 905-9750  
(714) 526-2227

April 23, 1990

Federal Communications Commission  
1919 M Street N.W., Rm. 222  
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for  
the Use of the 220-222 MHz Band by the Private Land Mobile Radio  
Services.

PR DK. No. 89-552

Dear Sirs:

We wish to voice our support for the Electronic Tracking Systems Inc. with  
regards to the above described matter.

We became involved with E.T.S. and the Electronic Tracking System in 1989 and  
have found it to be a valuable tool to Law Enforcement. Specifically, our  
agency has utilized ETS in both financial institutions and large commercial  
retail operations to combat robberies. The Electronic Tracking System has  
resulted in felony robbery apprehensions and recovery of property under  
circumstances that typically would have resulted in the suspect(s) evading  
arrest. We foresee a decline in the robbery rate which would make for a safer  
community.

A specific case where the Electronic Tracking System was particularly useful to  
us was the Robinson's jewelry robbery where five(5) felony suspects were  
arrested for robbery and approximately \$500,000 in stolen jewelry was recovered  
in our city. If you need any further information, please feel free to contact  
me at (213) 905-9751.

Very truly yours,

A handwritten signature in cursive script that reads "Ronald D. Meehan".

RONALD D. MEEHAN  
Chief of Police

RDM/mh1

# City of Seal Beach

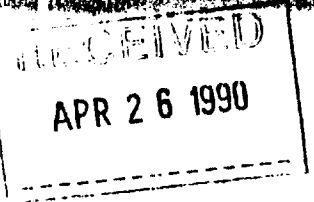
## POLICE DEPARTMENT



811 SEAL BEACH BOULEVARD  
SEAL BEACH, CALIFORNIA 90740-5899  
TELEPHONE (714) 846-3530 / (213) 431-2541

April 23, 1990

Federal Communications Commission  
1919 M Street NW Rm. 222  
Washington, D.C. 20036



ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's  
Rules to Provide for the Use of the 220-222  
MHz Band by the Private Land Mobile Radio  
Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice its support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in October, 1990 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was 4/16/90, 11-2039, a pursuit into L.A. If you need additional information from me, please call at (213) 431-2541.

Sincerely,

W.D. STEARNS  
Chief of Police

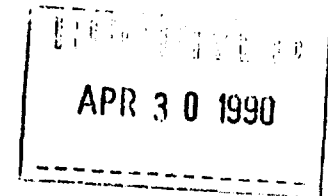
LT. David Van Holt  
Investigations Bureau Commander

**First  
Interstate  
Bank**

First Interstate Bank  
of California  
Bank Security Department  
1200 West Seventh Street  
Los Angeles, CA 90017  
213 239-4817

Keith D. Marshall  
Vice President  
Deputy Director of Security

April 24, 1990



Ms. Donna Searcy  
Office of the Secretary  
FEDERAL COMMUNICATIONS COMMISSION  
1919 "M" Street, Room 222  
Washington, D.C. 20036

RE: In the matter of Part 90 of the Commission's  
Rules to Provide for the Use of the 220-222  
MHz Band by the Private Land Mobile Radio  
Services - PR DK. NO. 89-552

Dear Ms. Searcy:

First Interstate Bank supports the application by  
Electronic Tracking Systems, Inc., Plano, Texas for  
additional frequency spectrum.

We have utilized the electronic tracking equipment since  
1984 and have found it to be a valuable tool in  
apprehending bank robbers. In addition, it has proven  
extremely valuable in the recovery of stolen money.

We are currently utilizing the ETS products in our branch  
offices in San Francisco, Sacramento and Orange County. We  
are expanding the use to include the Los Angeles  
metropolitan area. The equipment will be used in  
approximately 100 of our branch offices.

We look forward to continued use of this equipment and new  
products which ETS will develop utilizing the additional  
frequency spectrum.

Very truly yours,

KDM:drm

cc: C. Michael Iles  
Director of Marketing  
Electronic Tracking Systems, Inc.  
P.O. Box 260409  
Plano, Texas 75026-0409



**Century Federal Savings**  
AND LOAN ASSOCIATION

RECEIVED

APR 30 1990

April 23, 1990

Federal Communications Commission  
1919 M Street NW Rm. 222  
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's  
Rules to Provide for the Use of the 220-222 MHz Band by the  
Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

Century Federal Savings supports the position of Electronic  
Tracking Systems, Inc. with regards to the rule making  
described in the reference above.

We have recently had the Electronic Tracking System  
installed in three of our branches. We would have had them  
much earlier, but geographically they were not available to  
us. Soon we will install three additional branches.

In 21 years in law enforcement and 15 years in financial  
institution security, I have never seen a more positive  
method of safeguarding lives and property than the  
application of the Electronic Tracking System. When we can  
recover stolen property and be assured that the perpetrators  
will not soon be repeating their life threatening actions on  
our employees and the public we have accomplished a great  
deal.

When considering the allocation of additional channels, I  
believe that public safety must be a priority.

Sincerely.

Arnold E. Nielsen  
Vice President  
Director of Security



# MERCURY SAVINGS and loan association

April 24, 1990

EXECUTIVE OFFICES  
7812 Edinger Ave., P.O. Box 1010  
Huntington Beach, Calif. 92647  
Telefax (714) 848-9606 (Group II & III)

Federal Communications Commission  
1919 M Street NW Room 222  
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to  
Provide for the Use of the 220-222 MHz Band by the Pri-  
vate Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sir or Madam:

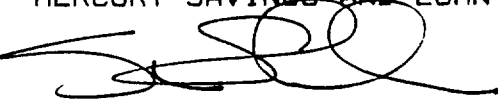
Once in a great while a product comes along that demonstrates such tremendous results and benefits the public interest to the extent that support is necessary by the companies who use such a product. Electronic Tracking Systems Inc. has such a product in its ability to deter and capture bank robbers in a significant number of occurrences. In fact, the government, in many instances, now subsidizes bank robbery losses as a result of the significant number of bank seizures in recent months.

We wish to voice its support of the comments of Electronic Tracking Systems, Inc. with regard to the rule-making described in the reference above.

Mercury became involved with Electronic Tracking Systems Inc. in late 1989 and feels it is a superior tool to other products designed to assist law enforcement in the battle against bank robbery. Having been in law enforcement for 11 years and 6 years in the financial banking industry I submit to you my experience and expertise in this industry and my recommendation that ETS be given the necessary channels needed to operate effectively.

Cordially,

MERCURY SAVINGS AND LOAN ASSOCIATION

  
Steven R. Shulman, Vice President  
Director of Security

Telephone (714) 842-9333





CITY OF  
**PORTLAND, OREGON**  
BUREAU OF POLICE

**J.E. BUD CLARK, MAYOR**  
Richard D. Walker, Chief of Police  
1111 S.W. 2nd Avenue  
Portland, OR 97204

August 1, 1989

Harry Curry  
Electronic Tracking Systems  
600 Data Drive, Suite 100  
Plano, Texas 75075

Sir:

As you are aware, over the last few years Portland, Oregon has experienced an alarming increase in the bank robbery rate. In fact, as you recall, we contacted you and your firm in 1983 following which you demonstrated your tracking system to law enforcement and financial people in Portland. That attempt did not gather enough support to bring your system to our city.

I don't know if you are aware of it, but Portland, in 1988 (see attached) led the nation's cities in bank robberies per capita. I have contacted several representatives of other departments in cities your system is currently serving and they all say it is the one main reason for their consistent decline in bank robberies since its installation.

I have been authorized by my Captain and the Deputy Chief of Investigation to request that your firm re-survey Portland financial institutions and determine if it is possible for Portland to be scheduled as your very next installation.

Please contact me if there is anything I can do to assure Portland gets positive consideration in this matter by your firm.

It has been a pleasure dealing with you and others with E.T.S. in the past and I look forward to future contacts.

Yours very truly,

Detective Robert D. Benson  
Detective Division  
Robbery Detail

RDB/dg



POLICE DEPARTMENT

**City of Reno**

POST OFFICE BOX 1900 RENO, NEVADA 89505 (702) 334-2100

R. V. BRADSHAW  
Chief of Police

July 18, 1991

Federal Communications Commission  
Washington, D.C.

Gentlemen:

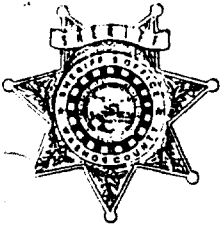
The Reno Police Department entered into a contract with ProNet Tracing Systems in 1988 to provide equipment and support for a electronic tracking system. Since that time, our agency has enjoyed a substantial increase in clearance rates for bank robberies, primarily based on the success of the system. We find the equipment has been reliable and of consistent use to uniformed police officers in tracking and capturing bank robbers and criminals involved in other types of robbery crimes.

It is anticipated that the contract with ProNet will be maintained in the future. We recommend the use of the ProNet (or similar) systems to any law enforcement agency.

Sincerely,

Richard Kirkland  
Interim Chief of Police

RK/mj



*Serving Since 1861*

## WASHOE COUNTY SHERIFF'S OFFICE

VINCENT G. SWINNEY  
*Sheriff*

911 PARR BOULEVARD  
RENO, NEVADA 89512 - 1000  
TELEPHONE: (Area 702) 328-3000

April 23, 1990

APR 24 1990

Federal Communications Commission  
1919 M Street NW Room 222  
Washington, D.C. 20036

Attention: Office of the Secretary: Donna Searcy

Reference: In the matter of part 90 of the Commission's Rules to  
Provide for the Use of the 220-222 MHz Band by the  
Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice support of the comments of Electronic Tracking Systems, Inc., with regards to rule-making described in the reference above.

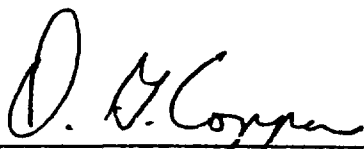
We became involved with ETS and the Electronic Tracking System in 1989 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

The Washoe County Sheriff's Office, the Reno and Sparks Police Departments jointly utilized the Electronic Tracking System. Through this system, we assisted the Sparks Police Department in the apprehension and arrest of a subject who perpetrated a robbery of a credit union in that jurisdiction. The equipment permitted our units to home in on the suspect's residence. Without such equipment, capture of the suspect and recovery of the property would not have been possible.

Page -2-

The Washoe County Sheriff's Office wholeheartedly supports the Electronic Tracking System.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. G. Coppa".

---

D.G. COPPA, UNDERSHERIFF

DGC/st

JUL 26 '91 08:27 CHIEFS OFFICE

P.2



# CITY OF HOUSTON

Telephone 713/247-1000

61 Riemer Street • Houston, Texas 77002

Kathryn J. Whitmire, Mayor

CITY COUNCIL MEMBERS: Larry McElwaine • Ernest McEwen, Sr. • Vince Ryan • Stella J. Lee • Frank G. Monahan • John B. Goodner • Chet Harkins  
Dale M. Garza • Ben T. Reyes • Beverly Clark • Benner Finley • Joe Greenwood • Alfred J. Galloway • Julian Robinson, Jr. • CITY CONTROLLER: George Greenlee

July 24, 1991

HOUSTON POLICE DEPARTMENT  
Elizabeth M. Watson  
Chief of Police



Office of the Director  
Federal Communications Commission  
1919 M Street, N. W.  
Washington, D. C. 20554

Dear Sirs:

Approximately two years ago, the Houston Police Department was approached by the local banking community and *ProNet Tracking Systems* and was asked to support their joint efforts in increasing the capture rate of bank robbery suspects. The application proposed (and implemented) would employ state-of-the-art computer and communications technology to track and capture felony robbery suspects with a high degree of accuracy.

Since that time, the *ProNet Tracking Systems* has proved its effectiveness several times (most recently this month). The system is clearly a sound and effective application of communications technology supporting public safety, law enforcement and private sector interests.

Through this correspondence, the Houston Police Department solicits your favorable consideration in licensing electronic tracking systems frequencies for public safety/law enforcement applications. Should you require additional information or supporting documentation, please feel free to contact us directly.

Sincerely,

Elizabeth M. Watson  
Chief of Police

EMW/wcw





# INTERNATIONAL UNION OF POLICE ASSOCIATIONS AFL-CIO

**THE ONLY UNION FOR LAW ENFORCEMENT OFFICERS**

- ☐ International Headquarters • 1016 Duke Street • Alexandria, Virginia 22314 • (703) 549-7473
- ☐ West Coast Regional Office • 175 E. Olive Ave. • Suite 400 • Burbank, CA 91502 • (818) 841-5428

ROBERT B. KLIESMET  
International President

AL ANGELE  
International  
Secretary-Treasurer

SAM CABRAL  
International Vice President

April 26, 1990

Ms. Donna Searcy  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20036

RECEIVED

APR 26 1990

PR. DK. NO. 89-552  
RM 6595

Federal Communications Commission  
Office of the Secretary

Dear Ms. Searcy:

On behalf of the International Union of Police Associations (AFL-CIO), this letter is submitted in support of the spectrum plan proposed by Electronic Tracking Systems, Inc. (ETS) in PR. DK. NO. 89-552. The union is the official representative of police service personnel from all regions of the United States. As such, it has an interest in assuring that the FCC adopts rules for the 220-222 MHz band that will meet important police needs, while helping to protect the lives of law enforcement personnel.

As proposed by ETS, ten discrete 5 KHz frequencies set aside exclusively for police use in criminal tracking operations will assist police departments in combatting violent crime across the nation. In addition, ten discrete 5 KHz frequencies for law enforcement tracking shared with federal agencies, such as the Federal Bureau of Investigation, and the Drug Enforcement Agency, will help local and state police involved in joint operations. Perhaps, most significantly, use of the 220-222 MHz spectrum for law enforcement tracking operations will be an important tool in the nation's war on drugs.

In sum, there can be no more important use for this spectrum than law enforcement tracking needs. Therefore, we urge the FCC to make the requested frequencies available on a nationwide basis to law enforcement personnel.

Sincerely,

Robert B. Kliesmet  
International President

RBK/dmk



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535

April 30, 1990

Mr. Albert J. Catalano  
Principal  
Murphy & Demory, Ltd.  
Suite 725  
2300 N Street, N.W.  
Washington, D.C. 20037

Dear Mr. Catalano:

I enjoyed meeting with you and Mr. Currie in regard to allocation of channels in the 220-222 MHz band for law enforcement tracking systems. As you indicated, the Electronic Tracking Systems, Inc. tracking system has proven to be very beneficial. Although the FBI has no immediate plans to purchase the system, we will continue cooperative law enforcement operations with local police departments using the system.

The Federal Government provides comments on frequency allocation matters to the FCC through the National Telecommunications and Information Administration (NTIA). Therefore the FBI will recommend NTIA propose that 10 narrowband simplex channels be made available for joint Federal and local authorities and will also urge NTIA support of your request for 10 channels for local law enforcement use.

The FBI is investigating the feasibility of using the 220-222 MHz band for future tracking requirements. If the study indicates a requirement, the FBI will propose the NTIA allocate exclusive Government channels to support tracking systems offered by any manufacturer.

Sincerely yours,

Kier T. Boyd  
Deputy Assistant Director  
Technical Services Division



### EXHIBIT 3

1. Section 1.972 would be amended by adding the following:

Section 1.972(e). Notwithstanding the provisions of Section 1.972(d), mutually exclusive applicants for a license to provide Electronic Tracking Service under the Business Radio Service that are acceptable for filing shall be subject to a summary proceeding to be conducted as follows:

(i) Within 30 days after the Private Radio Bureau issues a Public Notice identifying which applications are acceptable for filing, concise and factual arguments on the competing proposals from the competing applicants, potential customers, and other knowledgeable parties in interest shall be filed.

(ii) Within fifteen (15) days following the due date for the filing of comments prescribed under Section 1.972(e)(i), the Commission will accept concise and factual replies from the rival applicants.

(iii) From time to time during the course of this procedure, the Commission may request additional information from the applicants and hold informal conferences at which all competing applicants shall have the right to be represented.

(iv) The competing applicants shall be evaluated on the basis of: (a) technical and operational proposals; (b) experience in operating a private radio service to meet the safety needs of the public; and (c) whatever other issues the Commission deems appropriate with respect to the particular SMSA involved. A preference also will be granted to an applicant which is an ETS licensee in the adjacent SMSA.

(v) Upon evaluation of the applications, the information submitted and such other matters as may be officially noticed, the Commission will issue a decision granting one of the proposals which it concludes would best serve the public interest, convenience and necessity. The decision will report briefly and concisely the reasons for the Commission's selection and will deny the other application(s). This decision shall be issued within 90 days after completion of the filings prescribed under Section 1.972(e)(ii) and shall be considered final.

2. Section 90.7 would be amended by adding the following definition:

Electronic Tracking Service ("ETS"). A telemetry radiolocation Business Radio Service assisting law enforcement agencies and commercial entities in tracking the location of property and individuals.

3. Section 90.75(e) would be amended by adding the following:

Section 90.75(e)(5). Frequencies in the 216-220 MHz band may be assigned for the operation of an Electronic Tracking Service notwithstanding this limitation.

4. Section 90.175 would be amended by adding the following:

Section 90.173(k). Only one license shall be granted for provision of Electronic Tracking Service in each SMSA.

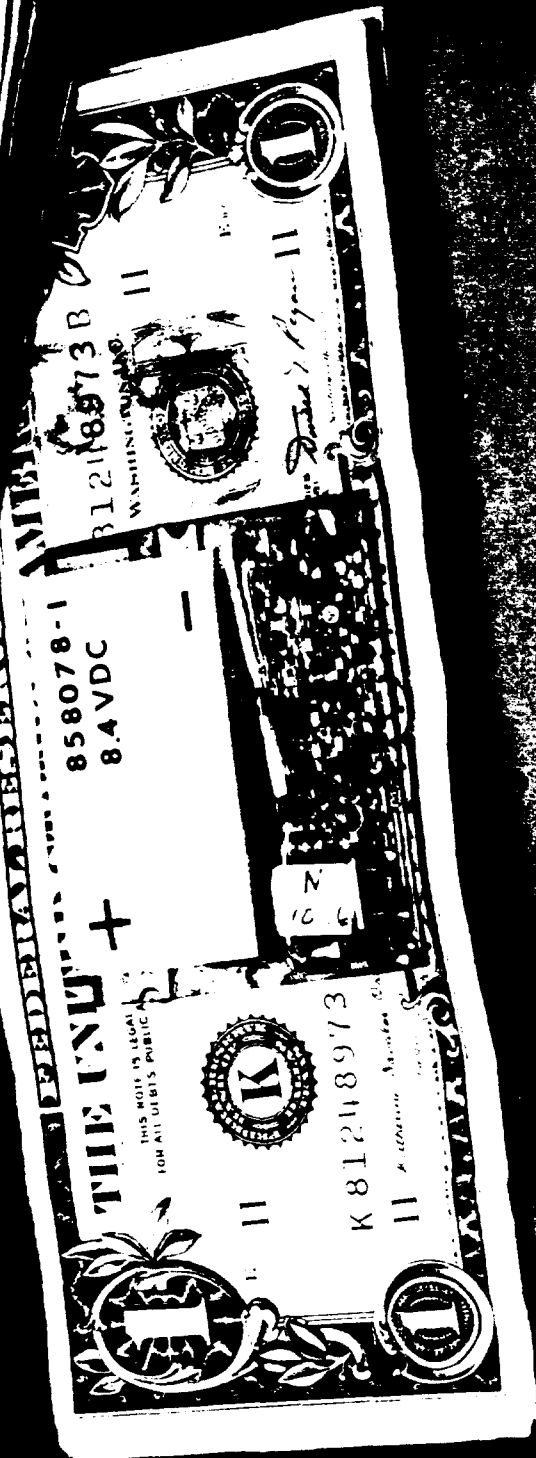
5. Section 90.403(h) would be amended by adding the following:

Section 90.403(h). The Business Radio Service licensee providing an Electronic Tracking Service shall be responsible for exercising effective operational control over all mobile stations which transmit under authority of such license. The proper installation, maintenance and repair of such mobile stations shall be the responsibility of the ETS licensee.





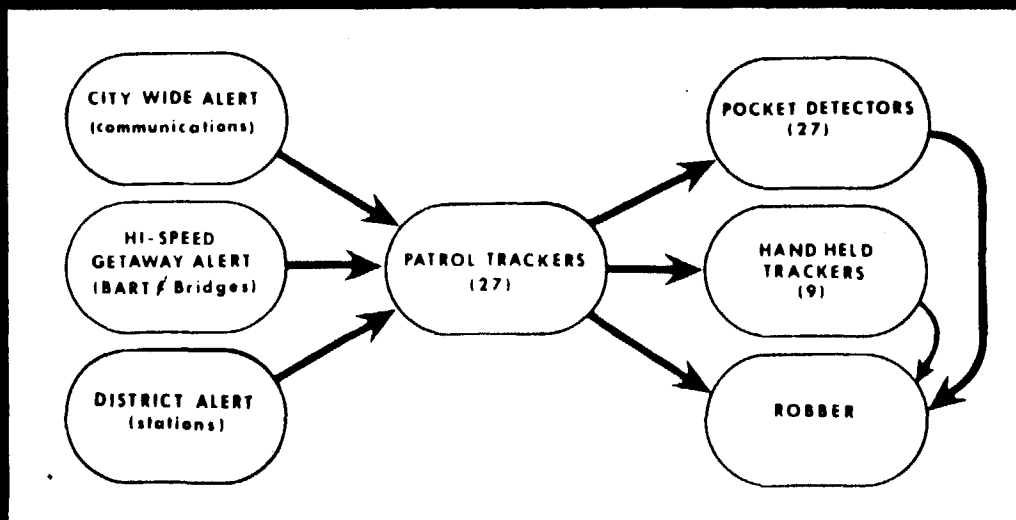
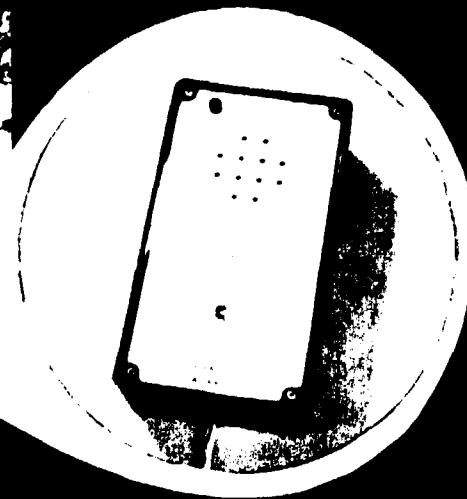
Safe for Customers & Employees

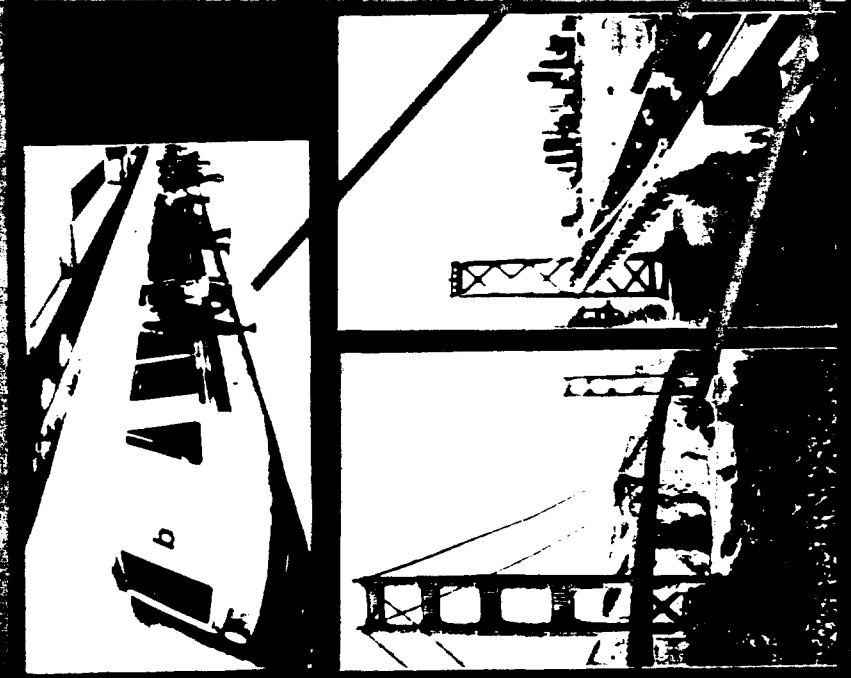


Bellville  
 Dayton Cts  
 S. 1136  
 Coopers  
 Oak Hill  
 Oak Hills  
 City Hills  
 Oak Hills



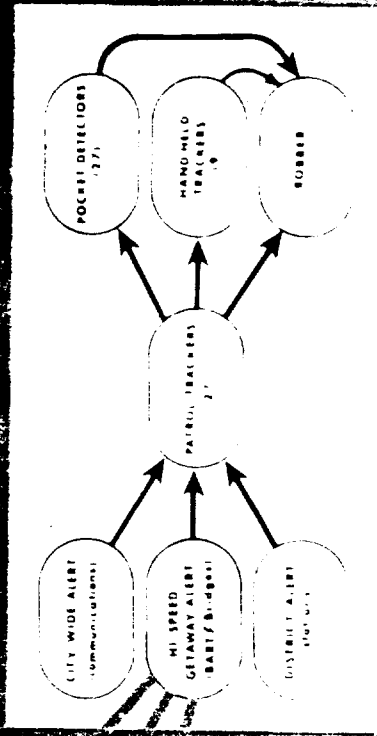
# District Stations



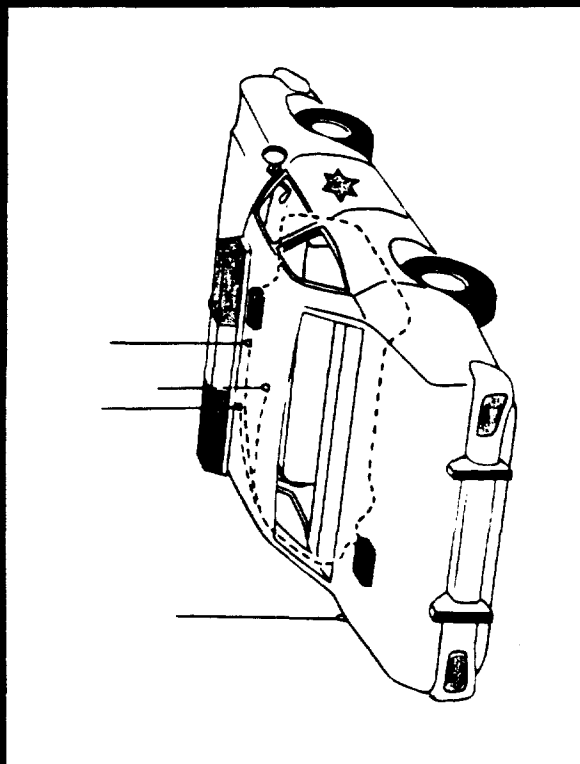


# TI-ETS

## Hi-Speed Getaway Alert

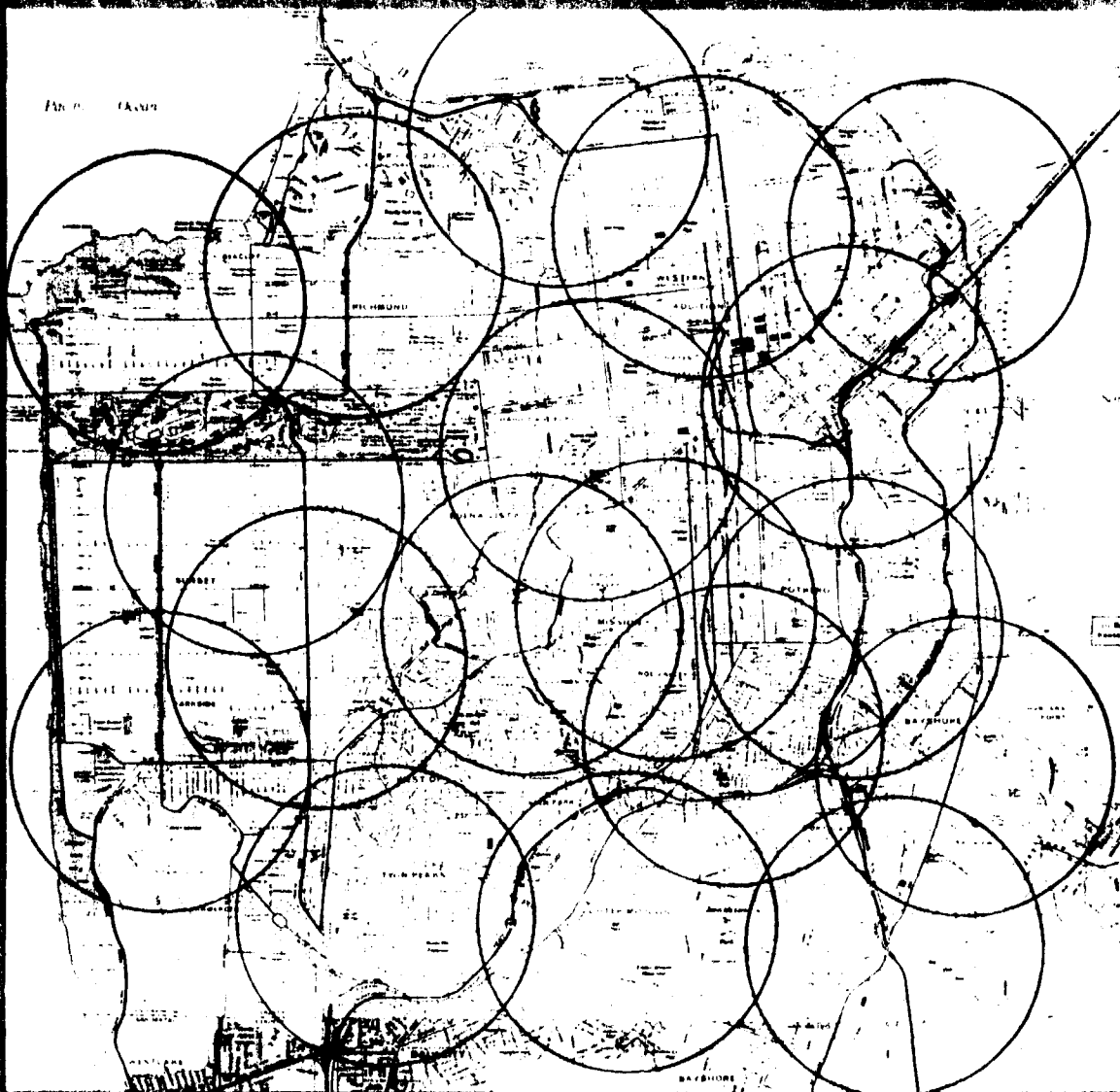


# **T1-Electronic Tracking System**



## POLICE TRACKING UNIT.

- NINE DISTRICT WITHIN SAN FRANCISCO
- THREE EQUIPPED CARS PER DISTRICT
- HAND HELD UNITS FOR ON-FOOT TRACKING TO BE AVAILABLE



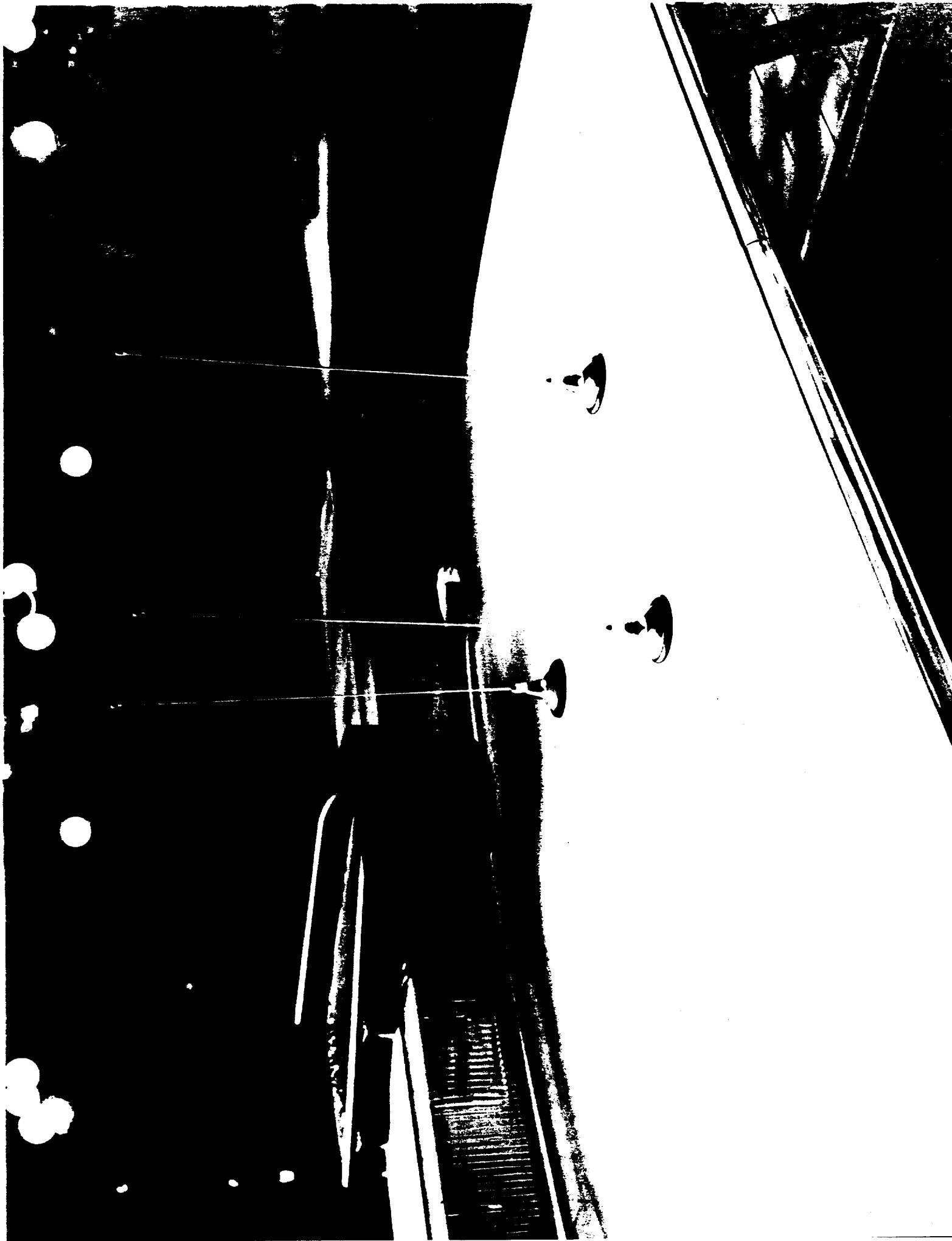
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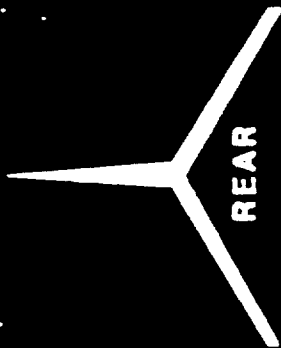
DISTANCE IN MILES

REAR

THRESHOLD

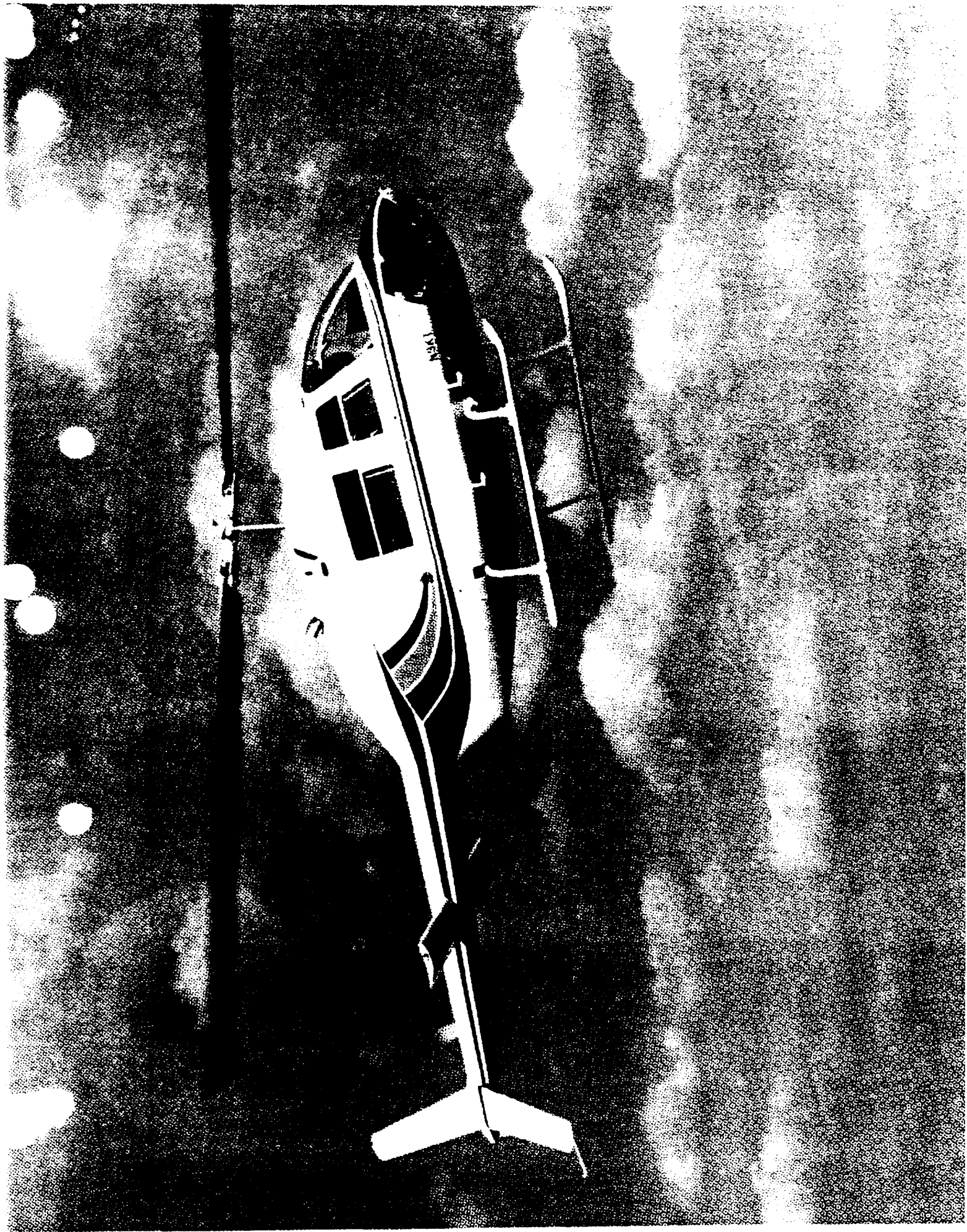
PHASE BAL





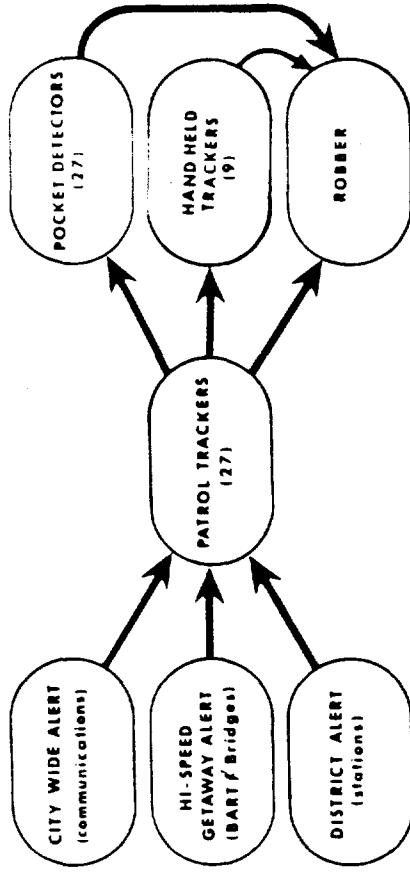
DISTANCE IN MILES





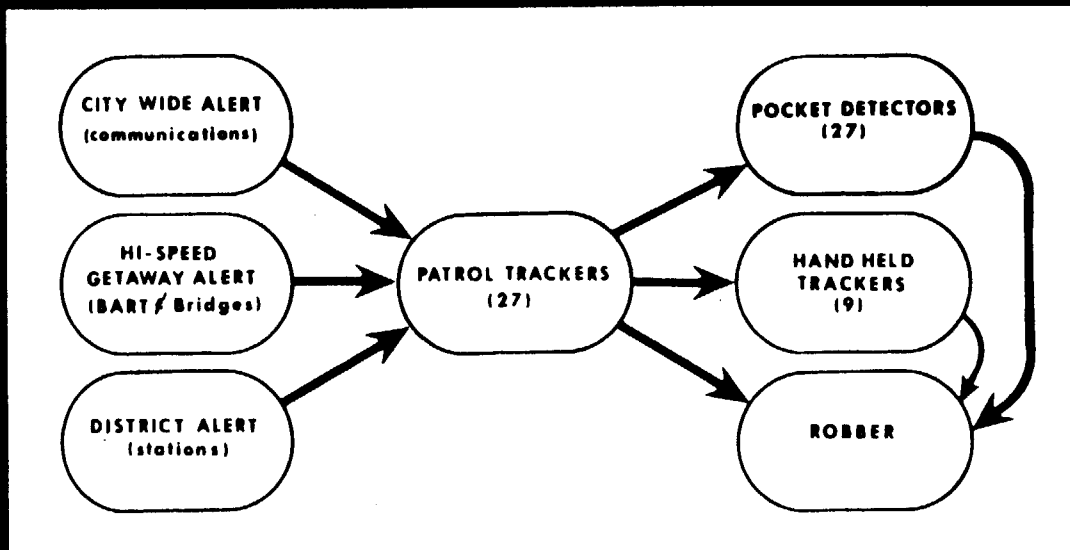
**TI-ETS**

**Hand Held Trackers**



# TI-ETS

## Pocket Detectors



Promotes capture away from ranch

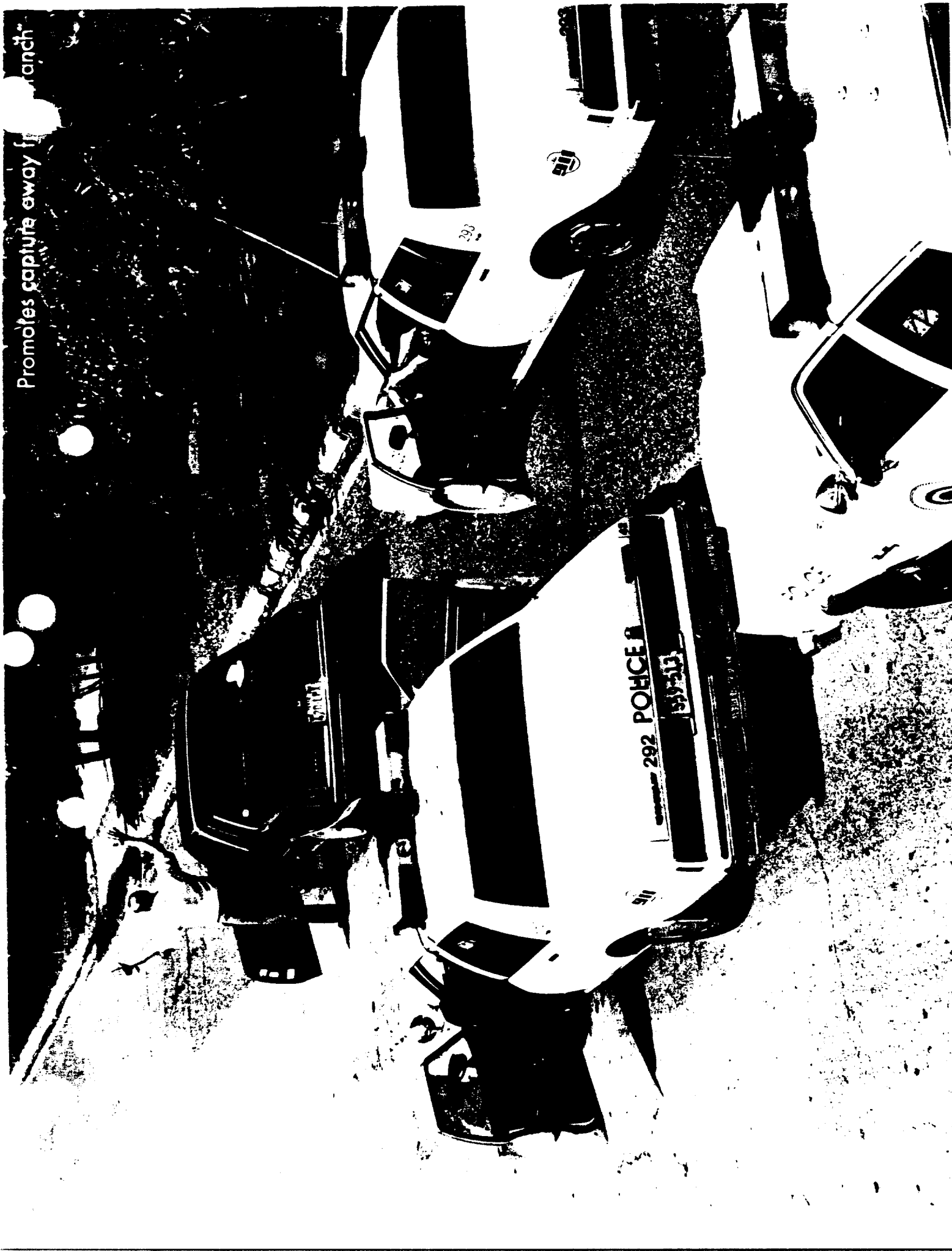






EXHIBIT 5

ETS OPERATION SPECIFICATIONS

|                     |   |
|---------------------|---|
| FREQUENCY           | 218, 218.5, or 219.0 MHz  |
| POWER               | < 120 milliwatts, ERP   |
| EMISSION DESIGNATOR | 80KOPON, 80KOAON, 80KOP2D, or 80KOA2D   |
| FREQUENCY TOLERANCE | +/- 0.001%, or +/-10 ppm  |
| BANDWIDTH           | +/- 4 KHz   |
| BANDSPREAD          | >40 KHz removed from the frequency assigned is attenuated >30 db below the unmodulated carrier. |
| OPERATION           | In accordance with Section 90.75 of the Commission's Rules for ETS                              |
| SPECIAL CONDITIONS  | Secondary to Maritime Mobile Service<br>Secondary to Federal Government                         |

GW03:69865

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OET